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2 Federal Public Defender  
3 Nevada State Bar No. 11479  
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Attorney for Cynthia Ann Morgan

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

Case No: 2:18-mj-0503-EJY

10 Plaintiff,

**STIPULATION TO VACATE  
STATUS HEARING  
AND CLOSE CASE**

11 v.

12 CYNTHIA ANN MORGAN

13 Defendant.

14  
15 IT IS HEREBY STIPULATED AND AGREED, by and between United States  
16 Attorney Nicholas A. Trutanich and Special Assistant United States Attorney Rachel L. Kent,  
17 counsel for the United States of America, and Federal Public Defender Rene L. Valladares  
18 and Assistant Federal Defender Katherine Tanaka, counsel for Cynthia Ann Morgan that the  
19 status hearing previously scheduled for June 16, 2020 at 1:30 p.m. be vacated and the case  
20 closed.

21 This Stipulation is entered into for the following reasons:

22 1. Defendant was charged Operating a motor vehicle under the influence of  
23 alcohol in violation of 36 C.F.R. § 4.23(a)(1); Operating a motor vehicle with a BAC of 0.08  
24 grams and higher in violation of 36 C.F.R. § 4.23(a)(2); Driving without a valid license in  
25 violation of 36 C.F.R. § 4.2(b) and NRS 483.550(1); and Interfering with agency functions in  
26 violations of 36 C.F.R. § 2.23(a)(1).

1           2. On June 14, 2018, Defendant pleaded guilty to operating a motor vehicle under  
2 the influence of alcohol in violation of 36 C.F.R. § 4.23(a)(1) and was sentenced to one year  
3 of unsupervised probation with the following conditions requiring Ms. Morgan (1) to  
4 complete a DUI and VIP course; (2) not to violate any local, state, or federal laws; and (3) not  
5 to enter the Lake Mead National Recreation Area for a period of (12) twelve months. The  
6 remaining charges were dismissed.

7           3. Defendant has successfully completed the conditions. Defendant has  
8 completed a DUI and VIP course and has reported she has not violated any local, state, or  
9 federal laws and that she did not enter the Lake Mead National Recreation from June 2018 to  
10 June 2019.

11          4. The Government is satisfied Defendant has completed the conditions of her  
12 sentencing.

13          5. Because Defendant has successfully completed the terms of her sentencing, the  
14 parties request the Court vacate the status hearing and ask that the case be closed.

15           DATE: June 15, 2020

16  
17          RENE L. VALLADARES  
18          Federal Public Defender

19          By /s/ Katherine Tanaka  
20          KATHERINE TANAKA  
21          Assistant Federal Public Defender

16          NICHOLAS A. TRUTANICH  
17          United States Attorney

18          By /s/ Rachel L. Kent  
19          RACHEL L. KENT  
20          Special Assistant United States Attorney

1                   **UNITED STATES DISTRICT COURT**  
2                   **DISTRICT OF NEVADA**

3                   UNITED STATES OF AMERICA,  
4                   Plaintiff,  
5                   v.  
6                   CYNTHIA ANN MORGAN  
7                   Defendant.

Case No. 2:18-mj-0503-EJY

**[PROPOSED] ORDER**

9                   **ORDER**

10                  Based on the pending Stipulation of counsel, the Court finds Defendant has  
11                  successfully completed the conditions of her sentencing.

12                  IT IS THEREFORE ORDERED that the status hearing scheduled for June 16, 2020, at  
13                  1:30 p.m. is vacated and the case is closed.

14                  DATED this 16th day of June, 2020.

  
15                  \_\_\_\_\_  
16                  UNITED STATES MAGISTRATE JUDGE

## **CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on June 15, 2020 she served an electronic copy of the above and foregoing  
**STIPULATION TO VACATE STATUS CHECK HEARING AND CLOSE CASE** by  
emailing to:

NICHOLAS A. TRUTANICH  
United States Attorney  
Rachel L. Kent  
Special Assistant United States Attorney  
501 Las Vegas Blvd. South  
Suite 1100  
Las Vegas, NV 89101

/s/ *Felicia Dahrenbourg*  
Employee of the Federal Public Defender